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Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. CV-07-5944-JST

MDL No. 1917

This Document Relates to:
All Indirect Purchaser Actions

**DECLARATION OF MARIO N. ALIOTO IN
SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' OPPOSITION TO
OBJECTOR DOUGLAS W. ST. JOHN'S
MOTION TO AMEND ORDER
APPOINTING SPECIAL MASTER QUINN**

Date: December 15, 2015
Time: 2:00 p.m.
Court: Courtroom 9, 19th Floor

Judge: Honorable Jon S. Tigar

DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' OPPOSITION
TO OBJECTOR DOUGLAS W. ST. JOHN'S MOTION TO AMEND ORDER APPOINTING SPECIAL MASTER
QUINN

Master File No. CV-07-5944-JST

1 I, Mario N. Alioto, declare as follows:

2 1. I am an attorney duly licensed by the State of California and am admitted to practice
3 before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott, LLP and my
4 firm serves as Lead Counsel for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned
5 action. I submit this declaration in support of IPPs’ Opposition to Objector Douglas W. St. John’s
6 Motion to Amend the Order Appointing Special Master Quinn. The matters set forth herein are
7 within my personal knowledge and if called upon and sworn as a witness I could competently testify
8 regarding them.

9 2. I have had a series of telephone conversations with Joseph Scott St. John, counsel for
10 Objector Douglas W. St. John. In those conversations, I have repeatedly informed Joseph Scott St.
11 John that expenses relating solely to IPP Counsel’s claims for attorneys’ fees would be paid for by
12 IPP Counsel, not by the Class. There has never been any dispute about this, and it is our present
13 intention, and it has been our intention before the matter was ever raised by Mr. St. John. To
14 reiterate, attorney time and expenses incurred in pursuit of the IPP Counsel fee claim has not been
15 included in the pending motion for attorneys’ fees. Our policy of paying further expenses relating to
16 our motion for attorneys’ fees is consistent with our policy in this case all along.

17 3. However, the fact that the Class is not paying fee-related expenses does not mean that
18 objectors such as Mr. St. John should not have to pay fee-related expenses. This matter remains in
19 dispute as set forth more fully in the opposition papers filed herewith.

20 4. As of July 31, 2015, the Notice Company, which developed the Notice Program used
21 for the proposed settlements, established and maintained online a website for the settlements that
22 includes the Detailed Notice, the Summary Notice and the Claim Form.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed on
24 December 4, 2015, in San Francisco, California.

25 /s/ Mario N. Alioto
26 Mario N. Alioto

27 ***Lead Counsel for the Indirect Purchaser Plaintiffs***